

October 13, 2020

RETURN DATE: ~~July 28, 2020~~ : SUPERIOR COURT

JANE DOE : J. D. OF NEW HAVEN

V. : AT NEW HAVEN

BRUCE & JOHNSON'S BRANFORD
MARINA, LLC, ET AL : JUNE 23, 2020

COMPLAINT

FIRST COUNT: (JANE DOE v. BRUCE & JOHNSON'S BRANFORD
MARINA, LLC) (Negligence)

1. At all times mentioned herein, the defendant, **BRUCE & JOHNSON'S BRANFORD MARINA, LLC**, was and is a domestic limited liability company authorized transact business in the State of Connecticut.

2. At all times mentioned herein, the defendant, **BRUCE & JOHNSON'S BRANFORD MARINA, LLC**, its agents, servants and/or employees, owned, possessed, managed, controlled and/or maintained the premises located at 51 Goodsell Point Road in Branford, Connecticut.

3. On August 10, 2019, the plaintiff, **JANE DOE**, was lawfully upon the premises at 51 Goodsell Point Road in Branford, Connecticut.

4. At some time prior to August 10, 2019, **PAUL DELUCA** was a member, guest, resident, visitor, and/or patron of the Marina and was lawfully upon the premises located at 51 Goodsell Point Road in Branford, Connecticut.

5. On August 10, 2019, the plaintiff, **JANE DOE**, was utilizing the showers provided by the defendant, **BRUCE & JOHNSON'S BRANFORD MARINA, LLC**, when she discovered that **PAUL DELUCA** was spying, watching, surveying, recording and/or documenting the plaintiff, **JANE DOE**, without her consent.

6. The spying, watching, surveying, recording and/or documenting of the plaintiff, **JANE DOE**, in the shower and her injuries resulting therefrom were caused by the negligence and carelessness of the defendant, **BRUCE & JOHNSON'S BRANFORD MARINA, LLC**, its agents, servants and/or employees, in that it:

- a. It failed to properly maintain the shower area;
- b. It failed to properly and reasonably inspect the shower area on the premises;
- c. It failed to provide adequate cover and privacy for its showers;
- d. It failed to smoke, tint, or shade the shower to ensure adequate cover and privacy;
- e. It failed to fence off the shower area;
- f. It failed to provide adequate security for those using said showers;
- g. It placed the shower in such a manner and location that it was vulnerable for others to have the ability to spy, watch, survey, record and/or document those using said showers;

- h. It failed to remove the inappropriate conditions from the shower area on a timely manner under all of the circumstances;
- i. It knew or in the exercise of reasonably care and inspection should have known that the shower area lacked adequate privacy and security and yet it failed to adopt and/or adequately implement procedures and/or conditions to remedy said conditions and protect its guests therefrom;
- j. It failed to warn the plaintiff of the lack of privacy, security and/or cover in the shower area;
- k. It failed to erect signs, barriers, disclaimers and/or warnings near the shower area;
- l. It failed to properly train and/or instruct its agents, servants and/or employees to keep the premises safe for its customers;
- m. It failed to investigate the background of PAUL DELUCA, even though it knew or should have known that failing to do so risked the health and safety of the public, including the plaintiff, **JANE DOE**;
- n. It failed to adequately investigate the background of PAUL DELUCA, even though it knew or should have known that failing to do so risked the health and safety of the public, including the plaintiff, **JANE DOE**.

- o. It knew or should have known that PAUL DELUCA behaved in an inappropriate manner around the public, yet failed to take actions to address this behavior;
- p. It had a duty to supervise PAUL DELUCA, yet failed to do so when it knew or should have known that he posed a foreseeable risk of harm to others, such as the plaintiff, **JANE DOE**;
- q. It knew or should have known that failing to supervise PAUL DELUCA, would pose a foreseeable risk of harm to others, such as the plaintiff, **JANE DOE**;
- r. It failed to properly observe, monitor, and/or control the actions of PAUL DELUCA;
- s. It failed to have adequate personnel to properly observe, monitor, and/or control the shower area;
- t. It failed to implement procedures and/or policies to protect people such as the plaintiff, **JANE DOE**, from members, guests, residents, visitors, and/or patrons like PAUL DELUCA ;
- u. It failed to warn the plaintiff that PAUL DELUCA had a propensity to behave in a dangerous and/or inappropriate manner;

- v. It caused, allowed and/or permitted an insufficient supervision of PAUL DELUCA when it knew or should have known that he had a propensity to behave in a dangerous and/or inappropriate manner.
- w. It knew or should have known that PAUL DELUCA was a risk to those on the property; and/or
- x. It knew or should have known of the background of PAUL DELUCA and yet allowed him on the property when they knew or should have known that doing risked the health and safety of the public, including the plaintiff, JANE DOE.

7. As a result of the negligence of the defendant, **BRUCE & JOHNSON'S BRANFORD MARINA, LLC**, its agents, servants and/or employees, the plaintiff, **JANE DOE**, suffered the following injuries, some or all of which may be permanent in nature:

- a. Anxiety;
- b. Emotional distress; and
- c. Pain and suffering, both mental and physical.

8. As a further result of the negligence of the defendant, **BRUCE & JOHNSON'S BRANFORD MARINA, LLC**, its agents, servants and/or employees, the plaintiff, **JANE DOE**, was forced to expend large sums of money for hospital and medical

care, medicines, diagnostic tests and therapy, all necessary to her recovery, and may be forced to expend additional sums in the future.

9. As a result of the negligence of the defendant, **BRUCE & JOHNSON'S BRANFORD MARINA, LLC**, the plaintiff, **JANE DOE**, was unable and remains unable to participate in and enjoy her usual activities.

SECOND COUNT: (JANE DOE v. BRUCE & JOHNSON'S BRANFORD MARINA, LLC) (Negligent Infliction of Emotional Distress)

1-9. Paragraphs 1 through 9 of the First Count are hereby incorporated and made corresponding paragraphs of this Second Count as if fully set forth herein.

10. The defendant, **BRUCE & JOHNSON'S BRANFORD MARINA, LLC**, through its actions and/or the actions of its agents, servants or employees above knew or should have known that its actions would create an unreasonable risk of causing emotional harm or distress, or other bodily injury, to the plaintiff, **JANE DOE**.

11. The defendant, **BRUCE & JOHNSON'S BRANFORD MARINA, LLC**, by its negligence, knew or should have known that its actions would create an unreasonable risk of causing emotional harm or distress, or other bodily injury to the plaintiff, **JANE DOE**.

THIRD COUNT: (JANE DOE v. BREWER YACHT YARD GROUP, LLC)
(Negligence)

1. At all times mentioned herein, the defendant, **BREWER YACHT YARD GROUP, LLC**, was and is a domestic limited liability company authorized transact business in the State of Connecticut.

2. At all times mentioned herein, the defendant, **BREWER YACHT YARD GROUP, LLC**, its agents, servants and/or employees, owned, possessed, managed, controlled and/or maintained the premises located at 51 Goodsell Point Road in Branford, Connecticut.

3. On August 10, 2019, the plaintiff, **JANE DOE**, was lawfully upon the premises at 51 Goodsell Point Road in Branford, Connecticut.

4. At some time prior to August 10, 2019, **PAUL DELUCA** was a member, guest, resident, visitor, and/or patron of the Marina and was lawfully upon the premises located at 51 Goodsell Point Road in Branford, Connecticut.

5. On August 10, 2019, the plaintiff, **JANE DOE**, was utilizing the showers provided by the defendant, **BREWER YACHT YARD GROUP, LLC**, when she discovered that **PAUL DELUCA** was spying, watching, surveying, recording and/or documenting the plaintiff, **JANE DOE**, without her consent.

6. The spying, watching, surveying, recording and/or documenting of the plaintiff, **JANE DOE**, in the shower and her injuries resulting therefrom were caused by

the negligence and carelessness of the defendant, **BREWER YACHT YARD GROUP, LLC**, its agents, servants and/or employees, in that it:

- a. It failed to properly maintain the shower area;
- b. It failed to properly and reasonably inspect the shower area on the premises;
- c. It failed to provide adequate cover and privacy for its showers;
- d. It failed to smoke, tint, or shade the shower to ensure adequate cover and privacy;
- e. It failed to fence off the shower area;
- f. It failed to provide adequate security for those using said showers;
- g. It placed the shower in such a manner and location that it was vulnerable for others to have the ability to spy, watch, survey, record and/or document those using said showers;
- h. It failed to remove the inappropriate conditions from the shower area on a timely manner under all of the circumstances;
- i. It knew or in the exercise of reasonably care and inspection should have known that the shower area lacked adequate privacy and security and yet it failed to adopt and/or adequately implement procedures and/or conditions to remedy said conditions and protect its guests therefrom;

- j. It failed to warn the plaintiff of the lack of privacy, security and/or cover in the shower area;
- k. It failed to erect signs, barriers, disclaimers and/or warnings near the shower area;
- l. It failed to properly train and/or instruct its agents, servants and/or employees to keep the premises safe for its customers;
- m. It failed to investigate the background of PAUL DELUCA, even though it knew or should have known that failing to do so risked the health and safety of the public, including the plaintiff, **JANE DOE**;
- n. It failed to adequately investigate the background of PAUL DELUCA, even though it knew or should have known that failing to do so risked the health and safety of the public, including the plaintiff, **JANE DOE**.
- o. It knew or should have known that PAUL DELUCA behaved in an inappropriate manner around the public, yet failed to take actions to address this behavior;
- p. It had a duty to supervise PAUL DELUCA, yet failed to do so when it knew or should have known that he posed a foreseeable risk of harm to others, such as the plaintiff, **JANE DOE**;

- q. It knew or should have known that failing to supervise PAUL DELUCA, would pose a foreseeable risk of harm to others, such as the plaintiff, JANE DOE;
- r. It failed to properly observe, monitor, and/or control the actions of PAUL DELUCA;
- s. It failed to have adequate personnel to properly observe, monitor, and/or control the shower area;
- t. It failed to implement procedures and/or policies to protect people such as the plaintiff, JANE DOE, from members, guests, residents, visitors, and/or patrons like PAUL DELUCA ;
- u. It failed to warn the plaintiff that PAUL DELUCA had a propensity to behave in a dangerous and/or inappropriate manner;
- v. It caused, allowed and/or permitted an insufficient supervision of PAUL DELUCA when it knew or should have known that he had a propensity to behave in a dangerous and/or inappropriate manner.
- w. It knew or should have known that PAUL DELUCA was a risk to those on the property; and/or
- x. It knew or should have known of the background of PAUL DELUCA and yet allowed him on the property when they knew or should have known that

doing risked the health and safety of the public, including the plaintiff, JANE DOE.

7. As a result of the negligence of the defendant, **BREWER YACHT YARD GROUP, LLC**, its agents, servants and/or employees, the plaintiff, **JANE DOE**, suffered the following injuries, some or all of which may be permanent in nature:

- a. Anxiety;
- b. Emotional distress; and
- c. Pain and suffering, both mental and physical.

8. As a further result of the negligence of the defendant, **BREWER YACHT YARD GROUP, LLC**, its agents, servants and/or employees, the plaintiff, **JANE DOE**, was forced to expend large sums of money for hospital and medical care, medicines, diagnostic tests and therapy, all necessary to her recovery, and may be forced to expend additional sums in the future.

9. As a result of the negligence of the defendant, **BREWER YACHT YARD GROUP, LLC**, the plaintiff, **JANE DOE**, was unable and remains unable to participate in and enjoy her usual activities.

FOURTH COUNT: (JANE DOE v. BREWER YACHT YARD GROUP, LLC)
(Negligent Infliction of Emotional Distress)

1-9. Paragraphs 1 through 9 of the Third Count are hereby incorporated and made corresponding paragraphs of this Fourth Count as if fully set forth herein.

10. The defendant, **BREWER YACHT YARD GROUP, LLC**, through its actions and/or the actions of its agents, servants or employees above knew or should have known that its actions would create an unreasonable risk of causing emotional harm or distress, or other bodily injury, to the plaintiff, **JANE DOE**.

11. The defendant, **BREWER YACHT YARD GROUP, LLC**, by its negligence, knew or should have known that its actions would create an unreasonable risk of causing emotional harm or distress, or other bodily injury to the plaintiff, **JANE DOE**.

FIFTH COUNT: (JANE DOE v. BREWER YACHT YARD GROUP HOLDINGS, INC.) (Negligence)

1. At all times mentioned herein, the defendant, **BREWER YACHT YARD GROUP HOLDINGS, INC.**, was and is a domestic corporation authorized transact business in the State of Connecticut.

2. At all times mentioned herein, the defendant, **BREWER YACHT YARD GROUP HOLDINGS, INC.**, its agents, servants and/or employees, owned, possessed,

managed, controlled and/or maintained the premises located at 51 Goodsell Point Road in Branford, Connecticut.

3. On August 10, 2019, the plaintiff, **JANE DOE**, was lawfully upon the premises at 51 Goodsell Point Road in Branford, Connecticut.

4. At some time prior to August 10, 2019, **PAUL DELUCA** was a member, guest, resident, visitor, and/or patron of the Marina and was lawfully upon the premises located at 51 Goodsell Point Road in Branford, Connecticut.

5. On August 10, 2019, the plaintiff, **JANE DOE**, was utilizing the showers provided by the defendant, **BREWER YACHT YARD GROUP HOLDINGS, INC.**, when she discovered that **PAUL DELUCA** was spying, watching, surveying, recording and/or documenting the plaintiff, **JANE DOE**, without her consent.

6. The spying, watching, surveying, recording and/or documenting of the plaintiff, **JANE DOE**, in the shower and her injuries resulting therefrom were caused by the negligence and carelessness of the defendant, **BREWER YACHT YARD GROUP HOLDINGS, INC.**, its agents, servants and/or employees, in that it:

- a. It failed to properly maintain the shower area;
- b. It failed to properly and reasonably inspect the shower area on the premises;
- c. It failed to provide adequate cover and privacy for its showers;

- d. It failed to smoke, tint, or shade the shower to ensure adequate cover and privacy;
- e. It failed to fence off the shower area;
- f. It failed to provide adequate security for those using said showers;
- g. It placed the shower in such a manner and location that it was vulnerable for others to have the ability to spy, watch, survey, record and/or document those using said showers;
- h. It failed to remove the inappropriate conditions from the shower area on a timely manner under all of the circumstances;
- i. It knew or in the exercise of reasonably care and inspection should have known that the shower area lacked adequate privacy and security and yet it failed to adopt and/or adequately implement procedures and/or conditions to remedy said conditions and protect its guests therefrom;
- j. It failed to warn the plaintiff of the lack of privacy, security and/or cover in the shower area;
- k. It failed to erect signs, barriers, disclaimers and/or warnings near the shower area;
- l. It failed to properly train and/or instruct its agents, servants and/or employees to keep the premises safe for its customers;

- m. It failed to investigate the background of PAUL DELUCA, even though it knew or should have known that failing to do so risked the health and safety of the public, including the plaintiff, **JANE DOE**;
- n. It failed to adequately investigate the background of PAUL DELUCA, even though it knew or should have known that failing to do so risked the health and safety of the public, including the plaintiff, **JANE DOE**.
- o. It knew or should have known that PAUL DELUCA behaved in an inappropriate manner around the public, yet failed to take actions to address this behavior;
- p. It had a duty to supervise PAUL DELUCA, yet failed to do so when it knew or should have known that he posed a foreseeable risk of harm to others, such as the plaintiff, **JANE DOE**;
- q. It knew or should have known that failing to supervise PAUL DELUCA, would pose a foreseeable risk of harm to others, such as the plaintiff, **JANE DOE**;
- r. It failed to properly observe, monitor, and/or control the actions of PAUL DELUCA;
- s. It failed to have adequate personnel to properly observe, monitor, and/or control the shower area;

- t. It failed to implement procedures and/or policies to protect people such as the plaintiff, **JANE DOE**, from members, guests, residents, visitors, and/or patrons like **PAUL DELUCA** ;
- u. It failed to warn the plaintiff that **PAUL DELUCA** had a propensity to behave in a dangerous and/or inappropriate manner;
- v. It caused, allowed and/or permitted an insufficient supervision of **PAUL DELUCA** when it knew or should have known that he had a propensity to behave in a dangerous and/or inappropriate manner.
- w. It knew or should have known that **PAUL DELUCA** was a risk to those on the property; and/or
- x. It knew or should have known of the background of **PAUL DELUCA** and yet allowed him on the property when they knew or should have known that doing risked the health and safety of the public, including the plaintiff, **JANE DOE**.

7. As a result of the negligence of the defendant, **BREWER YACHT YARD GROUP HOLDINGS, INC.**, its agents, servants and/or employees, the plaintiff, **JANE DOE**, suffered the following injuries, some or all of which may be permanent in nature:

- a. Anxiety;
- b. Emotional distress; and

c. Pain and suffering, both mental and physical.

8. As a further result of the negligence of the defendant, **BREWER YACHT YARD GROUP HOLDINGS, INC.**, its agents, servants and/or employees, the plaintiff, **JANE DOE**, was forced to expend large sums of money for hospital and medical care, medicines, diagnostic tests and therapy, all necessary to her recovery, and may be forced to expend additional sums in the future.

9. As a result of the negligence of the defendant, **BREWER YACHT YARD GROUP HOLDINGS, INC.**, the plaintiff, **JANE DOE**, was unable and remains unable to participate in and enjoy her usual activities.

SIXTH COUNT: **(JANE DOE v. BREWER YACHT YARD GROUP HOLDINGS, INC.) (Negligent Infliction of Emotional Distress)**

1-9. Paragraphs 1 through 9 of the Fifth Count are hereby incorporated and made corresponding paragraphs of this Sixth Count as if fully set forth herein.

10. The defendant, **BREWER YACHT YARD GROUP HOLDINGS, INC.**, through its actions and/or the actions of its agents, servants or employees above knew or should have known that its actions would create an unreasonable risk of causing emotional harm or distress, or other bodily injury, to the plaintiff, **JANE DOE**.

11. The defendant, **BREWER YACHT YARD GROUP HOLDINGS, INC.**, by its negligence, knew or should have known that its actions would create an unreasonable

risk of causing emotional harm or distress, or other bodily injury to the plaintiff, **JANE DOE**.

SEVENTH COUNT:(JANE DOE v. SAFE HARBOR, INC.) (Negligence)

1. At all times mentioned herein, the defendant, **SAFE HARBOR, INC.**, was and is a domestic corporation authorized transact business in the State of Connecticut.

2. At all times mentioned herein, the defendant, **SAFE HARBOR, INC.**, its agents, servants and/or employees, owned, possessed, managed, controlled and/or maintained the premises located at 51 Goodsell Point Road in Branford, Connecticut.

3. On August 10, 2019, the plaintiff, **JANE DOE**, was lawfully upon the premises at 51 Goodsell Point Road in Branford, Connecticut.

4. At some time prior to August 10, 2019, **PAUL DELUCA** was a member, guest, resident, visitor, and/or patron of the Marina and was lawfully upon the premises located at 51 Goodsell Point Road in Branford, Connecticut.

5. On August 10, 2019, the plaintiff, **JANE DOE**, was utilizing the showers provided by the defendant, **SAFE HARBOR, INC.**, when she discovered that **PAUL DELUCA** was spying, watching, surveying, recording and/or documenting the plaintiff, **JANE DOE**, without her consent.

6. The spying, watching, surveying, recording and/or documenting of the plaintiff, **JANE DOE**, in the shower and her injuries resulting therefrom were caused by the negligence and carelessness of the defendant, **SAFE HARBOR, INC.**, its agents, servants and/or employees, in that it:

- a. It failed to properly maintain the shower area;
- b. It failed to properly and reasonably inspect the shower area on the premises;
- c. It failed to provide adequate cover and privacy for its showers;
- d. It failed to smoke, tint, or shade the shower to ensure adequate cover and privacy;
- e. It failed to fence off the shower area;
- f. It failed to provide adequate security for those using said showers;
- g. It placed the shower in such a manner and location that it was vulnerable for others to have the ability to spy, watch, survey, record and/or document those using said showers;
- h. It failed to remove the inappropriate conditions from the shower area on a timely manner under all of the circumstances;
- i. It knew or in the exercise of reasonably care and inspection should have known that the shower area lacked adequate privacy and security and yet it

failed to adopt and/or adequately implement procedures and/or conditions to remedy said conditions and protect its guests therefrom;

- j. It failed to warn the plaintiff of the lack of privacy, security and/or cover in the shower area;
- k. It failed to erect signs, barriers, disclaimers and/or warnings near the shower area;
- l. It failed to properly train and/or instruct its agents, servants and/or employees to keep the premises safe for its customers;
- m. It failed to investigate the background of PAUL DELUCA, even though it knew or should have known that failing to do so risked the health and safety of the public, including the plaintiff, **JANE DOE**;
- n. It failed to adequately investigate the background of PAUL DELUCA, even though it knew or should have known that failing to do so risked the health and safety of the public, including the plaintiff, **JANE DOE**.
- o. It knew or should have known that PAUL DELUCA behaved in an inappropriate manner around the public, yet failed to take actions to address this behavior;

- p. It had a duty to supervise PAUL DELUCA, yet failed to do so when it knew or should have known that he posed a foreseeable risk of harm to others, such as the plaintiff, **JANE DOE**;
- q. It knew or should have known that failing to supervise PAUL DELUCA, would pose a foreseeable risk of harm to others, such as the plaintiff, **JANE DOE**;
- r. It failed to properly observe, monitor, and/or control the actions of PAUL DELUCA;
- s. It failed to have adequate personnel to properly observe, monitor, and/or control the shower area;
- t. It failed to implement procedures and/or policies to protect people such as the plaintiff, **JANE DOE**, from members, guests, residents, visitors, and/or patrons like PAUL DELUCA ;
- u. It failed to warn the plaintiff that PAUL DELUCA had a propensity to behave in a dangerous and/or inappropriate manner;
- v. It caused, allowed and/or permitted an insufficient supervision of PAUL DELUCA when it knew or should have known that he had a propensity to behave in a dangerous and/or inappropriate manner.

- w. It knew or should have known that PAUL DELUCA was a risk to those on the property; and/or
- x. It knew or should have known of the background of PAUL DELUCA and yet allowed him on the property when they knew or should have known that doing risked the health and safety of the public, including the plaintiff, JANE DOE.

7. As a result of the negligence of the defendant, **SAFE HARBOR, INC.**, its agents, servants and/or employees, the plaintiff, **JANE DOE**, suffered the following injuries, some or all of which may be permanent in nature:

- a. Anxiety;
- b. Emotional distress; and
- c. Pain and suffering, both mental and physical.

8. As a further result of the negligence of the defendant, **SAFE HARBOR, INC.**, its agents, servants and/or employees, the plaintiff, **JANE DOE**, was forced to expend large sums of money for hospital and medical care, medicines, diagnostic tests and therapy, all necessary to her recovery, and may be forced to expend additional sums in the future.

9. As a result of the negligence of the defendant, **SAFE HARBOR, INC.**, the plaintiff, **JANE DOE**, was unable and remains unable to participate in and enjoy her usual activities.

EIGHTH COUNT: (**JANE DOE v. SAFE HARBOR, INC.**) (**Negligent Infliction of Emotional Distress**)

1-9. Paragraphs 1 through 9 of the Seventh Count are hereby incorporated and made corresponding paragraphs of this Eighth Count as if fully set forth herein.

10. The defendant, **SAFE HARBOR, INC.**, through its actions and/or the actions of its agents, servants or employees above knew or should have known that its actions would create an unreasonable risk of causing emotional harm or distress, or other bodily injury, to the plaintiff, **JANE DOE**.

11. The defendant, **SAFE HARBOR, INC.**, by its negligence, knew or should have known that its actions would create an unreasonable risk of causing emotional harm or distress, or other bodily injury to the plaintiff, **JANE DOE**.

NINTH COUNT: (**JANE DOE v. SAFE HARBOR COMPANIES LLC**)
(**Negligence**)

1. At all times mentioned herein, the defendant, **SAFE HARBOR COMPANIES LLC**, was and is a domestic limited liability company authorized transact business in the State of Connecticut.

2. At all times mentioned herein, the defendant, **SAFE HARBOR COMPANIES LLC**, its agents, servants and/or employees, owned, possessed, managed, controlled and/or maintained the premises located at 51 Goodsell Point Road in Branford, Connecticut.

3. On August 10, 2019, the plaintiff, **JANE DOE**, was lawfully upon the premises at 51 Goodsell Point Road in Branford, Connecticut.

4. At some time prior to August 10, 2019, **PAUL DELUCA** was a member, guest, resident, visitor, and/or patron of the Marina and was lawfully upon the premises located at 51 Goodsell Point Road in Branford, Connecticut.

5. On August 10, 2019, the plaintiff, **JANE DOE**, was utilizing the showers provided by the defendant, **SAFE HARBOR COMPANIES LLC**, when she discovered that **PAUL DELUCA** was spying, watching, surveying, recording and/or documenting the plaintiff, **JANE DOE**, without her consent.

6. The spying, watching, surveying, recording and/or documenting of the plaintiff, **JANE DOE**, in the shower and her injuries resulting therefrom were caused by the negligence and carelessness of the defendant, **SAFE HARBOR COMPANIES LLC**, its agents, servants and/or employees, in that it:

- a. It failed to properly maintain the shower area;
- b. It failed to properly and reasonably inspect the shower area on the premises;

- c. It failed to provide adequate cover and privacy for its showers;
- d. It failed to smoke, tint, or shade the shower to ensure adequate cover and privacy;
- e. It failed to fence off the shower area;
- f. It failed to provide adequate security for those using said showers;
- g. It placed the shower in such a manner and location that it was vulnerable for others to have the ability to spy, watch, survey, record and/or document those using said showers;
- h. It failed to remove the inappropriate conditions from the shower area on a timely manner under all of the circumstances;
- i. It knew or in the exercise of reasonably care and inspection should have known that the shower area lacked adequate privacy and security and yet it failed to adopt and/or adequately implement procedures and/or conditions to remedy said conditions and protect its guests therefrom;
- j. It failed to warn the plaintiff of the lack of privacy, security and/or cover in the shower area;
- k. It failed to erect signs, barriers, disclaimers and/or warnings near the shower area;

- l. It failed to properly train and/or instruct its agents, servants and/or employees to keep the premises safe for its customers;
- m. It failed to investigate the background of PAUL DELUCA, even though it knew or should have known that failing to do so risked the health and safety of the public, including the plaintiff, **JANE DOE**;
- n. It failed to adequately investigate the background of PAUL DELUCA, even though it knew or should have known that failing to do so risked the health and safety of the public, including the plaintiff, **JANE DOE**.
- o. It knew or should have known that PAUL DELUCA behaved in an inappropriate manner around the public, yet failed to take actions to address this behavior;
- p. It had a duty to supervise PAUL DELUCA, yet failed to do so when it knew or should have known that he posed a foreseeable risk of harm to others, such as the plaintiff, **JANE DOE**;
- q. It knew or should have known that failing to supervise PAUL DELUCA, would pose a foreseeable risk of harm to others, such as the plaintiff, **JANE DOE**;
- r. It failed to properly observe, monitor, and/or control the actions of PAUL DELUCA;

- s. It failed to have adequate personnel to properly observe, monitor, and/or control the shower area;
- t. It failed to implement procedures and/or policies to protect people such as the plaintiff, **JANE DOE**, from members, guests, residents, visitors, and/or patrons like **PAUL DELUCA** ;
- u. It failed to warn the plaintiff that **PAUL DELUCA** had a propensity to behave in a dangerous and/or inappropriate manner;
- v. It caused, allowed and/or permitted an insufficient supervision of **PAUL DELUCA** when it knew or should have known that he had a propensity to behave in a dangerous and/or inappropriate manner.
- w. It knew or should have known that **PAUL DELUCA** was a risk to those on the property; and/or
- x. It knew or should have known of the background of **PAUL DELUCA** and yet allowed him on the property when they knew or should have known that doing risked the health and safety of the public, including the plaintiff, **JANE DOE**.

7. As a result of the negligence of the defendant, **SAFE HARBOR COMPANIES LLC**, its agents, servants and/or employees, the plaintiff, **JANE DOE**, suffered the following injuries, some or all of which may be permanent in nature:

- a. Anxiety;
- b. Emotional distress; and
- c. Pain and suffering, both mental and physical.

8. As a further result of the negligence of the defendant, **SAFE HARBOR COMPANIES LLC**, its agents, servants and/or employees, the plaintiff, **JANE DOE**, was forced to expend large sums of money for hospital and medical care, medicines, diagnostic tests and therapy, all necessary to her recovery, and may be forced to expend additional sums in the future.

9. As a result of the negligence of the defendant, **SAFE HARBOR COMPANIES LLC**, the plaintiff, **JANE DOE**, was unable and remains unable to participate in and enjoy her usual activities.

TENTH COUNT: **(JANE DOE v. SAFE HARBOR COMPANIES LLC)**
 (Negligent Infliction of Emotional Distress)

1-9. Paragraphs 1 through 9 of the Ninth Count are hereby incorporated and made corresponding paragraphs of this Tenth Count as if fully set forth herein.

10. The defendant, **SAFE HARBOR COMPANIES LLC**, through its actions and/or the actions of its agents, servants or employees above knew or should have known that its actions would create an unreasonable risk of causing emotional harm or distress, or other bodily injury, to the plaintiff, **JANE DOE**.

11. The defendant, **SAFE HARBOR COMPANIES LLC**, by its negligence, knew or should have known that its actions would create an unreasonable risk of causing emotional harm or distress, or other bodily injury to the plaintiff, **JANE DOE**.

ELEVENTH COUNT: **(JANE DOE v. SHM BRUCE & JOHNSON, LLC)**
(Negligence)

1. At all times mentioned herein, the defendant, **SHM BRUCE & JOHNSON, LLC**, was and is a foreign limited liability company authorized to transact business in the State of Connecticut.

2. At all times mentioned herein, the defendant, **SHM BRUCE & JOHNSON, LLC**, its agents, servants and/or employees, owned, possessed, managed, controlled and/or maintained the premises located at 51 Goodsell Point Road in Branford, Connecticut.

3. On August 10, 2019, the plaintiff, **JANE DOE**, was lawfully upon the premises at 51 Goodsell Point Road in Branford, Connecticut.

4. At some time prior to August 10, 2019, **PAUL DELUCA** was a member, guest, resident, visitor, and/or patron of the Marina and was lawfully upon the premises located at 51 Goodsell Point Road in Branford, Connecticut.

5. On August 10, 2019, the plaintiff, **JANE DOE**, was utilizing the showers provided by the defendant, **SHM BRUCE & JOHNSON, LLC**, when she discovered that

PAUL DELUCA was spying, watching, surveying, recording and/or documenting the plaintiff, **JANE DOE**, without her consent.

6. The spying, watching, surveying, recording and/or documenting of the plaintiff, **JANE DOE**, in the shower and her injuries resulting therefrom were caused by the negligence and carelessness of the defendant, **SHM BRUCE & JOHNSON, LLC**, its agents, servants and/or employees, in that it:

- a. It failed to properly maintain the shower area;
- b. It failed to properly and reasonably inspect the shower area on the premises;
- c. It failed to provide adequate cover and privacy for its showers;
- d. It failed to smoke, tint, or shade the shower to ensure adequate cover and privacy;
- e. It failed to fence off the shower area;
- f. It failed to provide adequate security for those using said showers;
- g. It placed the shower in such a manner and location that it was vulnerable for others to have the ability to spy, watch, survey, record and/or document those using said showers;
- h. It failed to remove the inappropriate conditions from the shower area on a timely manner under all of the circumstances;

- i. It knew or in the exercise of reasonably care and inspection should have known that the shower area lacked adequate privacy and security and yet it failed to adopt and/or adequately implement procedures and/or conditions to remedy said conditions and protect its guests therefrom;
- j. It failed to warn the plaintiff of the lack of privacy, security and/or cover in the shower area;
- k. It failed to erect signs, barriers, disclaimers and/or warnings near the shower area;
- l. It failed to properly train and/or instruct its agents, servants and/or employees to keep the premises safe for its customers;
- m. It failed to investigate the background of PAUL DELUCA, even though it knew or should have known that failing to do so risked the health and safety of the public, including the plaintiff, **JANE DOE**;
- n. It failed to adequately investigate the background of PAUL DELUCA, even though it knew or should have known that failing to do so risked the health and safety of the public, including the plaintiff, **JANE DOE**.
- o. It knew or should have known that PAUL DELUCA behaved in an inappropriate manner around the public, yet failed to take actions to address this behavior;

- p. It had a duty to supervise PAUL DELUCA, yet failed to do so when it knew or should have known that he posed a foreseeable risk of harm to others, such as the plaintiff, JANE DOE;
- q. It knew or should have known that failing to supervise PAUL DELUCA, would pose a foreseeable risk of harm to others, such as the plaintiff, JANE DOE;
- r. It failed to properly observe, monitor, and/or control the actions of PAUL DELUCA;
- s. It failed to have adequate personnel to properly observe, monitor, and/or control the shower area;
- t. It failed to implement procedures and/or policies to protect people such as the plaintiff, JANE DOE, from members, guests, residents, visitors, and/or patrons like PAUL DELUCA ;
- u. It failed to warn the plaintiff that PAUL DELUCA had a propensity to behave in a dangerous and/or inappropriate manner;
- v. It caused, allowed and/or permitted an insufficient supervision of PAUL DELUCA when it knew or should have known that he had a propensity to behave in a dangerous and/or inappropriate manner.

- w. It knew or should have known that PAUL DELUCA was a risk to those on the property; and/or
- x. It knew or should have known of the background of PAUL DELUCA and yet allowed him on the property when they knew or should have known that doing risked the health and safety of the public, including the plaintiff, JANE DOE.

7. As a result of the negligence of the defendant, **SHM BRUCE & JOHNSON, LLC**, its agents, servants and/or employees, the plaintiff, **JANE DOE**, suffered the following injuries, some or all of which may be permanent in nature:

- a. Anxiety;
- b. Emotional distress; and
- c. Pain and suffering, both mental and physical.

8. As a further result of the negligence of the defendant, **SHM BRUCE & JOHNSON, LLC**, its agents, servants and/or employees, the plaintiff, **JANE DOE**, was forced to expend large sums of money for hospital and medical care, medicines, diagnostic tests and therapy, all necessary to her recovery, and may be forced to expend additional sums in the future.

9. As a result of the negligence of the defendant, **SHM BRUCE & JOHNSON, LLC**, the plaintiff, **JANE DOE**, was unable and remains unable to participate in and enjoy her usual activities.

TWELFTH COUNT: **(JANE DOE v. SHM BRUCE & JOHNSON, LLC)**
(Negligent Infliction of Emotional Distress)

1-9. Paragraphs 1 through 9 of the Eleventh Count are hereby incorporated and made corresponding paragraphs of this Twelfth Count as if fully set forth herein.

10. The defendant, **SHM BRUCE & JOHNSON, LLC**, through its actions and/or the actions of its agents, servants or employees above knew or should have known that its actions would create an unreasonable risk of causing emotional harm or distress, or other bodily injury, to the plaintiff, **JANE DOE**.

11. The defendant, **SHM BRUCE & JOHNSON, LLC**, by its negligence, knew or should have known that its actions would create an unreasonable risk of causing emotional harm or distress, or other bodily injury to the plaintiff, **JANE DOE**.

THIRTEENTH COUNT: **(JANE DOE v. PAUL DELUCA) (Negligence)**

1. At all times mentioned herein, **BRUCE & JOHNSON'S BRANFORD MARINA, LLC, BREWER YACHT YARD GROUP, LLC, BREWER YACHT YARD GROUP HOLDINGS, INC., SAFE HARBOR, INC., SAFE HARBOR COMPANIES LLC** and/or **SHM BRUCE & JOHNSON, LLC**, its agents, servants

and/or employees, owned, possessed, managed, controlled and/or maintained the premises located at 51 Goodsell Point Road in Branford, Connecticut.

2. On August 10, 2019, the plaintiff, **JANE DOE**, was lawfully upon the premises at 51 Goodsell Point Road in Branford, Connecticut.

3. At some time prior to August 10, 2019, the defendant, **PAUL DELUCA** was a member, guest, resident, visitor, and/or patron of the Marina and was lawfully upon the premises located at 51 Goodsell Point Road in Branford, Connecticut.

4. On August 10, 2019, the plaintiff, **JANE DOE**, was utilizing the showers provided by **BRUCE & JOHNSON'S BRANFORD MARINA, LLC, BREWER YACHT YARD GROUP, LLC, BREWER YACHT YARD GROUP HOLDINGS, INC., SAFE HARBOR, INC., SAFE HARBOR COMPANIES LLC** and/or **SHM BRUCE & JOHNSON, LLC**, when she discovered that the defendant, **PAUL DELUCA**, was spying, watching, surveying, recording and/or documenting the plaintiff, **JANE DOE**, without her consent.

5. The spying, watching, surveying, recording and/or documenting of the plaintiff, **JANE DOE**, in the shower and her injuries resulting therefrom were caused by the negligence of the defendant, **PAUL DELUCA**, in one or more of the following ways:

- a. He spied, watched, surveyed, recorded and/or documented the plaintiff, **JANE DOE**, in the shower without her consent;

- b. He filmed the plaintiff, **JANE DOE**, in the shower without her consent;
- c. He made unwelcome advances toward the plaintiff, **JANE DOE**; and/or
- d. He wrongfully obtained access to view the plaintiff, **JANE DOE** in the shower.

6. As a result of the negligence of the defendant, **PAUL DELUCA**, the plaintiff, **JANE DOE**, suffered the following injuries, some or all of which may be permanent in nature:

- a. Anxiety;
- b. Emotional distress; and
- c. Pain and suffering, both mental and physical.

7. As a further result of the negligence of the defendant, **PAUL DELUCA**, the plaintiff, **JANE DOE**, was forced to expend large sums of money for hospital and medical care, medicines, diagnostic tests and therapy, all necessary to her recovery, and may be forced to expend additional sums in the future.

8. As a result of the negligence of the defendant, **PAUL DELUCA**, the plaintiff, **JANE DOE**, was unable and remains unable to participate in and enjoy her usual activities.

FOURTEENTH COUNT: (JANE DOE v. PAUL DELUCA) (Negligent Infliction of Emotional Distress)

1-8. Paragraphs 1 through 8 of the Thirteenth Count are hereby incorporated and made corresponding paragraphs of this Fourteenth Count as if fully set forth herein.

9. The defendant, **PAUL DELUCA**, knew or should have known that his actions would create an unreasonable risk of causing emotional harm or distress, or other bodily injury, to the plaintiff, **JANE DOE**.

FIFTEENTH COUNT: (JANE DOE v. WILDWOOD PROPERTY MANAGEMENT, LLC) (Negligence)

1. At all times mentioned herein, the defendant, **WILDWOOD PROPERTY MANAGEMENT, LLC**, was and is a domestic limited liability company authorized to transact business in the State of Connecticut.

2. At all times mentioned herein, the defendant, **WILDWOOD PROPERTY MANAGEMENT, LLC**, its agents, servants and/or employees, owned, possessed, managed, controlled and/or maintained the premises located at 51 Goodsell Point Road in Branford, Connecticut.

3. On August 10, 2019, the plaintiff, **JANE DOE**, was lawfully upon the premises at 51 Goodsell Point Road in Branford, Connecticut.

4. At some time prior to August 10, 2019, PAUL DELUCA was a member, guest, resident, visitor, and/or patron of the Marina and was lawfully upon the premises located at 51 Goodsell Point Road in Branford, Connecticut.

5. On August 10, 2019, the plaintiff, **JANE DOE**, was utilizing the showers provided by the defendant, **WILDWOOD PROPERTY MANAGEMENT, LLC**, when she discovered that PAUL DELUCA was spying, watching, surveying, recording and/or documenting the plaintiff, **JANE DOE**, without her consent.

6. The spying, watching, surveying, recording and/or documenting of the plaintiff, **JANE DOE**, in the shower and her injuries resulting therefrom were caused by the negligence and carelessness of the defendant, **WILDWOOD PROPERTY MANAGEMENT, LLC**, its agents, servants and/or employees, in that it:

- a. It failed to properly maintain the shower area;
- b. It failed to properly and reasonably inspect the shower area on the premises;
- c. It failed to provide adequate cover and privacy for its showers;
- d. It failed to smoke, tint, or shade the shower to ensure adequate cover and privacy;
- e. It failed to fence off the shower area;
- f. It failed to provide adequate security for those using said showers;

- g. It placed the shower in such a manner and location that it was vulnerable for others to have the ability to spy, watch, survey, record and/or document those using said showers;
- h. It failed to remove the inappropriate conditions from the shower area on a timely manner under all of the circumstances;
- i. It knew or in the exercise of reasonably care and inspection should have known that the shower area lacked adequate privacy and security and yet it failed to adopt and/or adequately implement procedures and/or conditions to remedy said conditions and protect its guests therefrom;
- j. It failed to warn the plaintiff of the lack of privacy, security and/or cover in the shower area;
- k. It failed to erect signs, barriers, disclaimers and/or warnings near the shower area;
- l. It failed to properly train and/or instruct its agents, servants and/or employees to keep the premises safe for its customers;
- m. It failed to investigate the background of PAUL DELUCA, even though it knew or should have known that failing to do so risked the health and safety of the public, including the plaintiff, **JANE DOE**;

- n. It failed to adequately investigate the background of PAUL DELUCA, even though it knew or should have known that failing to do so risked the health and safety of the public, including the plaintiff, **JANE DOE**.
- o. It knew or should have known that PAUL DELUCA behaved in an inappropriate manner around the public, yet failed to take actions to address this behavior;
- p. It had a duty to supervise PAUL DELUCA, yet failed to do so when it knew or should have known that he posed a foreseeable risk of harm to others, such as the plaintiff, **JANE DOE**;
- q. It knew or should have known that failing to supervise PAUL DELUCA, would pose a foreseeable risk of harm to others, such as the plaintiff, **JANE DOE**;
- r. It failed to properly observe, monitor, and/or control the actions of PAUL DELUCA;
- s. It failed to have adequate personnel to properly observe, monitor, and/or control the shower area;
- t. It failed to implement procedures and/or policies to protect people such as the plaintiff, **JANE DOE**, from members, guests, residents, visitors, and/or patrons like PAUL DELUCA ;

- u. It failed to warn the plaintiff that PAUL DELUCA had a propensity to behave in a dangerous and/or inappropriate manner;
- v. It caused, allowed and/or permitted an insufficient supervision of PAUL DELUCA when it knew or should have known that he had a propensity to behave in a dangerous and/or inappropriate manner.
- w. It knew or should have known that PAUL DELUCA was a risk to those on the property; and/or
- x. It knew or should have known of the background of PAUL DELUCA and yet allowed him on the property when they knew or should have known that doing risked the health and safety of the public, including the plaintiff, JANE DOE.

7. As a result of the negligence of the defendant, **WILDWOOD PROPERTY MANAGEMENT, LLC**, its agents, servants and/or employees, the plaintiff, **JANE DOE**, suffered the following injuries, some or all of which may be permanent in nature:

- a. Anxiety;
- b. Emotional distress; and
- c. Pain and suffering, both mental and physical.

8. As a further result of the negligence of the defendant, **WILDWOOD PROPERTY MANAGEMENT, LLC**, its agents, servants and/or employees, the

plaintiff, **JANE DOE**, was forced to expend large sums of money for hospital and medical care, medicines, diagnostic tests and therapy, all necessary to her recovery, and may be forced to expend additional sums in the future.

9. As a result of the negligence of the defendant, **WILDWOOD PROPERTY MANAGEMENT, LLC**, the plaintiff, **JANE DOE**, was unable and remains unable to participate in and enjoy her usual activities.

SIXTEENTH COUNT:

(JANE DOE v. WILDWOOD PROPERTY MANAGEMENT, LLC)
(Negligent Infliction of Emotional Distress)

1-9. Paragraphs 1 through 9 of the Fifteenth Count are hereby incorporated and made corresponding paragraphs of this Sixteenth Count as if fully set forth herein.

10. The defendant, **WILDWOOD PROPERTY MANAGEMENT, LLC**, through its actions and/or the actions of its agents, servants or employees above knew or should have known that its actions would create an unreasonable risk of causing emotional harm or distress, or other bodily injury, to the plaintiff, **JANE DOE**.

11. The defendant, **WILDWOOD PROPERTY MANAGEMENT, LLC**, by its negligence, knew or should have known that its actions would create an unreasonable risk of causing emotional harm or distress, or other bodily injury to the plaintiff, **JANE DOE**.

SEVENTEENTH COUNT: (JANE DOE v. WESTFORD REAL ESTATE MANAGEMENT, LLC) (Negligence)

1. At all times mentioned herein, the defendant, **WESTFORD REAL ESTATE MANAGEMENT, LLC**, was and is a domestic limited liability company authorized to transact business in the State of Connecticut.

2. At all times mentioned herein, the defendant, **WESTFORD REAL ESTATE MANAGEMENT, LLC**, its agents, servants and/or employees, owned, possessed, managed, controlled and/or maintained the premises located at 51 Goodsell Point Road in Branford, Connecticut.

3. On August 10, 2019, the plaintiff, **JANE DOE**, was lawfully upon the premises at 51 Goodsell Point Road in Branford, Connecticut.

4. At some time prior to August 10, 2019, **PAUL DELUCA** was a member, guest, resident, visitor, and/or patron of the Marina and was lawfully upon the premises located at 51 Goodsell Point Road in Branford, Connecticut.

5. On August 10, 2019, the plaintiff, **JANE DOE**, was utilizing the showers provided by the defendant, **WESTFORD REAL ESTATE MANAGEMENT, LLC**, when she discovered that **PAUL DELUCA** was spying, watching, surveying, recording and/or documenting the plaintiff, **JANE DOE**, without her consent.

6. The spying, watching, surveying, recording and/or documenting of the plaintiff, **JANE DOE**, in the shower and her injuries resulting therefrom were caused by

the negligence and carelessness of the defendant, **WESTFORD REAL ESTATE MANAGEMENT, LLC**, its agents, servants and/or employees, in that it:

- a. It failed to properly maintain the shower area;
- b. It failed to properly and reasonably inspect the shower area on the premises;
- c. It failed to provide adequate cover and privacy for its showers;
- d. It failed to smoke, tint, or shade the shower to ensure adequate cover and privacy;
- e. It failed to fence off the shower area;
- f. It failed to provide adequate security for those using said showers;
- g. It placed the shower in such a manner and location that it was vulnerable for others to have the ability to spy, watch, survey, record and/or document those using said showers;
- h. It failed to remove the inappropriate conditions from the shower area on a timely manner under all of the circumstances;
- i. It knew or in the exercise of reasonably care and inspection should have known that the shower area lacked adequate privacy and security and yet it failed to adopt and/or adequately implement procedures and/or conditions to remedy said conditions and protect its guests therefrom;

- j. It failed to warn the plaintiff of the lack of privacy, security and/or cover in the shower area;
- k. It failed to erect signs, barriers, disclaimers and/or warnings near the shower area;
- l. It failed to properly train and/or instruct its agents, servants and/or employees to keep the premises safe for its customers;
- m. It failed to investigate the background of PAUL DELUCA, even though it knew or should have known that failing to do so risked the health and safety of the public, including the plaintiff, **JANE DOE**;
- n. It failed to adequately investigate the background of PAUL DELUCA, even though it knew or should have known that failing to do so risked the health and safety of the public, including the plaintiff, **JANE DOE**.
- o. It knew or should have known that PAUL DELUCA behaved in an inappropriate manner around the public, yet failed to take actions to address this behavior;
- p. It had a duty to supervise PAUL DELUCA, yet failed to do so when it knew or should have known that he posed a foreseeable risk of harm to others, such as the plaintiff, **JANE DOE**;

- q. It knew or should have known that failing to supervise PAUL DELUCA, would pose a foreseeable risk of harm to others, such as the plaintiff, JANE DOE;
- r. It failed to properly observe, monitor, and/or control the actions of PAUL DELUCA;
- s. It failed to have adequate personnel to properly observe, monitor, and/or control the shower area;
- t. It failed to implement procedures and/or policies to protect people such as the plaintiff, JANE DOE, from members, guests, residents, visitors, and/or patrons like PAUL DELUCA ;
- u. It failed to warn the plaintiff that PAUL DELUCA had a propensity to behave in a dangerous and/or inappropriate manner;
- v. It caused, allowed and/or permitted an insufficient supervision of PAUL DELUCA when it knew or should have known that he had a propensity to behave in a dangerous and/or inappropriate manner.
- w. It knew or should have known that PAUL DELUCA was a risk to those on the property; and/or
- x. It knew or should have known of the background of PAUL DELUCA and yet allowed him on the property when they knew or should have known that

doing risked the health and safety of the public, including the plaintiff, JANE DOE.

7. As a result of the negligence of the defendant, **WESTFORD REAL ESTATE MANAGEMENT, LLC**, its agents, servants and/or employees, the plaintiff, JANE DOE, suffered the following injuries, some or all of which may be permanent in nature:

- a. Anxiety;
- b. Emotional distress; and
- c. Pain and suffering, both mental and physical.

8. As a further result of the negligence of the defendant, **WESTFORD REAL ESTATE MANAGEMENT, LLC**, its agents, servants and/or employees, the plaintiff, JANE DOE, was forced to expend large sums of money for hospital and medical care, medicines, diagnostic tests and therapy, all necessary to her recovery, and may be forced to expend additional sums in the future.

9. As a result of the negligence of the defendant, **WESTFORD REAL ESTATE MANAGEMENT, LLC**, the plaintiff, JANE DOE, was unable and remains unable to participate in and enjoy her usual activities.

EIGHTEENTH COUNT:

(JANE DOE v. WESTFORD REAL ESTATE MANAGEMENT, LLC)
(Negligent Infliction of Emotional Distress)

1-9. Paragraphs 1 through 9 of the Seventeenth Count are hereby incorporated and made corresponding paragraphs of this Eighteenth Count as if fully set forth herein.

10. The defendant, **WESTFORD REAL ESTATE MANAGEMENT, LLC**, through its actions and/or the actions of its agents, servants or employees above knew or should have known that its actions would create an unreasonable risk of causing emotional harm or distress, or other bodily injury, to the plaintiff, **JANE DOE**.

11. The defendant, **WESTFORD REAL ESTATE MANAGEMENT, LLC**, by its negligence, knew or should have known that its actions would create an unreasonable risk of causing emotional harm or distress, or other bodily injury to the plaintiff, **JANE DOE**.

WHEREFORE, the plaintiff claims money damages as to all counts.

THE PLAINTIFF,
JANE DOE

By. 

Garrett M. Moore, Sr., Esq.
Moore, O'Brien & Foti
891 Straits Turnpike
Middlebury, CT 06762
Phone: (203) 272-5881
Juris No.: 408519
Her Attorneys

October 13, 2020
RETURN DATE: ~~July 28, 2020~~ : SUPERIOR COURT
JANE DOE : J. D. OF NEW HAVEN
V. : AT NEW HAVEN
BRUCE & JOHNSON'S BRANFORD
MARINA, LLC, ET AL : JUNE 23, 2020

STATEMENT OF AMOUNT IN DEMAND

The amount of money damages claimed is greater than Fifteen Thousand Dollars
(\$15,000.00), exclusive of interest and costs.

THE PLAINTIFF
JANE DOE

By: 

Garrett M. Moore, Sr., Esq.
Moore, O'Brien & Foti
891 Straits Turnpike
Middlebury, CT 06762
Phone: (203) 272-5881
Juris No.: 408519
Her Attorneys

October 13, 2020

RETURN DATE: July 28, 2020	:	SUPERIOR COURT
JANE DOE	:	J. D. OF NEW HAVEN
V.	:	AT NEW HAVEN
BRUCE & JOHNSON'S BRANFORD MARINA, LLC, ET AL	:	JULY 23, 2020

EX PARTE MOTION TO LODGE AFFIDAVIT UNDER SEAL

The plaintiff, Jane Doe, hereby moves, pursuant to Connecticut Practice Book § 7-4B, to lodge her Affidavit under seal. The plaintiff respectfully submits that this is necessary to preserve her interests which, under the circumstances of this case, override the public's interest in viewing such materials. The plaintiff's Memorandum in Support of this Motion is attached hereto.

THE PLAINTIFF,
JANE DOE

By: 308035
Garrett M. Moore, Sr., Esq.
Moore, O'Brien & Foti
891 Straits Turnpike
Middlebury, CT 06762
Phone: (203) 272-5881
Juris No.: 408519
Her Attorneys

Judicial District of New Haven
**SUPERIOR COURT
FILED**

JUL 14 2020

CHIEF CLERK'S OFFICE

Moore, O'Brien & Foti - Attorneys at Law
891 Straits Turnpike, Middlebury, CT 06762
203 272-5881 - JURIS NO. 408519

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October 13, 2020
RETURN DATE: ~~July 23, 2020~~ : SUPERIOR COURT
JANE DOE : J. D. OF NEW HAVEN
V. : AT NEW HAVEN
BRUCE & JOHNSON'S BRANFORD
MARINA, LLC, ET AL : JULY 23, 2020

**MEMORANDUM OF LAW IN SUPPORT OF
EX PARTE MOTION TO LODGE AFFIDAVIT UNDER SEAL**

Pursuant to Connecticut Practice Book Sec. 7-4B, the plaintiff in the above-captioned matter, Jane Doe, hereby files this Memorandum of Law in support of her Motion to Lodge her Affidavit Under Seal in the above-captioned matter.

I. Factual Background

On or about August 10, 2019, the plaintiff, Jane Doe, alleges she was spied upon, watched, surveyed, recorded and/or documented in the shower by Paul DeLuca. Paul DeLuca was arrested on August 10, 2019, having been charged with voyeurism with malice and disorderly conduct, and he was released from custody on a promise to appear. In light of the COVID-19 pandemic, his pretrial has been continued a number of times and is presently scheduled for August 14, 2020.

II. Law and Argument

Connecticut Practice Book § 11-20A(c) provides that "Upon written motion of any party, or upon its own motion, the judicial authority may order that files, affidavits, documents,

or other materials on file or lodged with the court or in connection with a court proceeding be sealed or their disclosure limited" where the court determines that "such order is necessary to preserve an interest which is determined to override the public's interest in viewing such materials." § 11-20A(h)(1) provides, in part, "[p]seudonyms may be used in place of the name of a party or parties only with the prior approval of the judicial authority and only if the judicial authority concludes that such order is necessary to preserve an interest which is determined to override the public's interest in knowing the name of the party or parties."

Pseudonyms are allowed in a limited number of circumstances. In Vargas v. Doe, the Connecticut Appellate Court held "[t]he most compelling situations [for granting a motion to proceed anonymously] involve matters which are highly sensitive, such as social stigmatization, real danger of physical harm, or where the injury litigated against would occur as a result of the disclosure of the [party's] identity. . . . There must be a strong social interest in concealing the identity of the [party]." (Internal quotations and citations omitted). Vargas v. Doe, 96 Conn. App. 399, 411 (2006).

In this instant matter, the plaintiff is alleging that she was spied upon, watched, surveyed, recorded and/or documented in the shower by Paul DeLuca. It is axiomatic that this case deals with matters that are highly sensitive. Failure to allow the plaintiff to lodge her affidavit under seal and continue using a pseudonym would subject her to embarrassment and ridicule. The plaintiff has a substantial privacy interest that far outweighs any benefit derived from using her name publicly.

III. Conclusion

WHEREFORE, for the foregoing reasons, the plaintiff respectfully requests the Court grant her Motion to Lodge the Affidavit Under Seal.

THE PLAINTIFF,
JANE DOE

By: 308035
Garrett M. Moore, Sr., Esq.
Moore, O'Brien & Foti
891 Straits Turnpike
Middlebury, CT 06762
Phone: (203) 272-5881
Juris No.: 408519
Her Attorneys

October 13, 2020

RETURN DATE: ~~July 28, 2020~~ : SUPERIOR COURT

JANE DOE : J. D. OF NEW HAVEN

V. : AT NEW HAVEN

BRUCE & JOHNSON'S BRANFORD
MARINA, LLC, ET AL : JUNE 23, 2020

TEMPORARY EX PARTE APPLICATION
FOR THE USE OF A PSEUDONYM

Pursuant to Connecticut Practice Book §11-20A(h)(1), (2), and (3), Jane Doe, the plaintiff in the above-captioned matter, hereby request leave to proceed with the above-captioned matter under a fictitious name and represents:

1. That proceeding with this litigation under pseudonym is necessary to preserve an interest which overrides the public's interest in knowing the name of the plaintiff.
2. That the special and sensitive circumstances of this case justify the use of a pseudonym, as the disclosure of the plaintiff's identity could reasonably lead to the plaintiff being harassed, injured, ridiculed and embarrassed, given the allegations in the plaintiff's complaint.
3. The undersigned attaches a Memorandum of Law, Writ, Summons and Complaint in support of the instant Application.
4. The allegations as contained in the Complaint involve an alleged cyberstalking committed by one of the defendants.

Judicial District of New Haven
SUPERIOR COURT
FILED

JUL 14 2020

CHIEF CLERK'S OFFICE

Moore, O'Brien & Foti - Attorneys at Law
891 Straits Turnpike, Middlebury, CT 06762
203 272-5881 - JURIS NO. 408519

102

October 13, 2020
RETURN DATE: ~~July 23, 2020~~ : SUPERIOR COURT
JANE DOE : J. D. OF NEW HAVEN
V. : AT NEW HAVEN
BRUCE & JOHNSON'S BRANFORD
MARINA, LLC, ET AL : JULY 23, 2020

**MEMORANDUM OF LAW IN SUPPORT OF
EX PARTE MOTION TO LODGE AFFIDAVIT UNDER SEAL**

Pursuant to Connecticut Practice Book Sec. 7-4B, the plaintiff in the above-captioned matter, Jane Doe, hereby files this Memorandum of Law in support of her Motion to Lodge her Affidavit Under Seal in the above-captioned matter.

I. Factual Background

On or about August 10, 2019, the plaintiff, Jane Doe, alleges she was spied upon, watched, surveyed, recorded and/or documented in the shower by Paul DeLuca. Paul DeLuca was arrested on August 10, 2019, having been charged with voyeurism with malice and disorderly conduct, and he was released from custody on a promise to appear. In light of the COVID-19 pandemic, his pretrial has been continued a number of times and is presently scheduled for August 14, 2020.

II. Law and Argument

Connecticut Practice Book § 11-20A(c) provides that "Upon written motion of any party, or upon its own motion, the judicial authority may order that files, affidavits, documents,

October 13, 2020
RETURN DATE: ~~July 28, 2020~~ : SUPERIOR COURT
JANE DOE : J. D. OF NEW HAVEN
V. : AT NEW HAVEN
BRUCE & JOHNSON'S BRANFORD
MARINA, LLC, ET AL : JULY 23, 2020

ORDER FOR THE LODGING OF PLAINTIFF'S AFFIDAVIT UNDER SEAL

The court finds that the plaintiff's interest in protecting her identity compelling and significant in light of the allegations of voyeurism and that such interest outweighs the public's interest in knowing the name of the plaintiff. The lodging of plaintiff's affidavit is necessary and no lesser alternative will suffice. It is hereby ORDERED:

1. The plaintiff's affidavit shall be lodged under seal.

Dated at New Haven this _____ day of _____ 2020.

BY THE COURT

J.

5. The undersigned references such plaintiff only by a description and not by name to preserve that plaintiff's privacy in a manner consistent with the plaintiff's request.

6. The pseudonym is necessary and no lesser alternative will suffice.

WHEREFORE, the plaintiff hereby moves for an ex parte order permitting her to file the Complaint and prosecute such action, including all references to her name therein, pseudonymously.

THE PLAINTIFF,

By: 

Garrett M. Moore, Sr., Esq.
Moore, O'Brien & Foti
891 Straits Turnpike
Middlebury, CT 06762
Phone: (203) 272-5881
Juris No.: 408519
Their Attorneys

JUL 14 2020

CHIEF CLERK'S OFFICE

October 13, 2020
RETURN DATE: ~~July 28, 2020~~ : SUPERIOR COURT
JANE DOE : J. D. OF NEW HAVEN
V. : AT NEW HAVEN
BRUCE & JOHNSON'S BRANFORD
MARINA, LLC, ET AL : JUNE 23, 2020

**MEMORANDUM OF LAW IN SUPPORT OF TEMPORARY EX PARTE
APPLICATION FOR THE USE OF A PSEUDONYM**

Pursuant to Connecticut Practice Book §11-20A(h)(1), (2), and (3), Jane Doe, the plaintiff in the above-captioned matter, hereby files this Memorandum of Law in support of her request to proceed with the above-captioned matter under a fictitious name.

I. Factual Background

On or about August 1-, 2019, the plaintiff, Jane Doe, alleges she was a victim of voyeurism by Paul Deluca a member of the defendants' organization. Paul Deluca was arrested on August 10, 2019 and is currently awaiting trial.

II. Law and Argument

Connecticut Practice Book §11-20A(h)(1) provides, in part, "[p]seudonyms may be used in place of the name of a party or parties only with the prior approval of the judicial authority and only if the judicial authority concludes that such order is necessary to preserve an interest which is determined to override the public's interest in knowing the name of the party or parties." Connecticut Practice Book §11-20A(h)(2) further provides that a Court may grant

an ex parte application for permission to use a pseudonym provided a hearing on the continued use of such pseudonym is held within fifteen days of the return date.

Pseudonyms are allowed in a limited number of circumstances. In Vargas v. Doe, the Connecticut Appellate Court held "[t]he most compelling situations [for granting a motion to proceed anonymously] involve matters which are highly sensitive, such as social stigmatization, real danger of physical harm, or where the injury litigated against would occur as a result of the disclosure of the [party's] identity. . . . There must be a strong social interest in concealing the identity of the [party]." (Internal quotations and citations omitted).

In this instant matter, the plaintiff is alleging voyeurism. It is axiomatic that this case deals with matters that are highly sensitive. Failure to allow the plaintiff to use a pseudonym would subject her to public ridicule. The plaintiff has a substantial privacy interest that far outweighs any benefit derived from using her name publicly.

III. Conclusion

WHEREFORE, for the foregoing reasons, the plaintiff respectfully requests the Court grant her application to use a pseudonym in the commencement of the aforementioned civil action.

THE PLAINTIFF,

By: 

Garrett M. Moore, Sr., Esq.
Moore, O'Brien & Foti
891 Straits Turnpike
Middlebury, CT 06762
Phone: (203) 272-5881
Juris No.: 408519
Their Attorneys

JUL 14 2020

CHIEF CLERK'S OFFICE

October 13, 2020
RETURN DATE: ~~July 28, 2020~~ : SUPERIOR COURT
JANE DOE : J. D. OF NEW HAVEN
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BRUCE & JOHNSON'S BRANFORD
MARINA, LLC, ET AL : JUNE 23, 2020

ORDER FOR TEMPORARY EX PARTE APPLICATION
FOR THE USE OF A PSEUDONYM

The court finds that the plaintiffs' interest in protecting their identity compelling and significant in light of the allegations of voyeurism and that such interest outweighs the public's interest in knowing the name of the plaintiff. The pseudonym is necessary and no lesser alternative will suffice. It is hereby ORDERED:

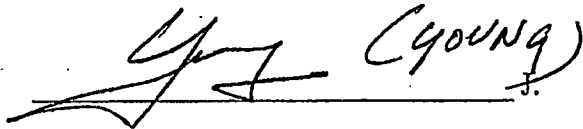
1. The Applicants can commence a suit against BRUCE & JOHNSON'S BRANFORD MARINA, LLC, BREWER YACHT YARD GROUP, LLC, BREWER YACHT YARD GROUP HOLDINGS, INC., SAFE HARBOR, INC., SAFE HARBOR COMPANIES LLC, SHM BRUCE & JOHNSON, LLC, WILDWOOD PROPERTY MANAGEMENT, LLC, WESTFORD REAL ESTATE MANAGEMENT, LLC, and PAUL DELUCA using a pseudonym;
2. That a hearing on the continued use of the pseudonym shall be held no less than fifteen (15) days after the return date of the Complaint;

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3. A copy of this Order along with the Complaint and any other motions or applications shall be served upon BRUCE & JOHNSON'S BRANFORD MARINA, LLC, BREWER YACHT YARD GROUP, LLC, BREWER YACHT YARD GROUP HOLDINGS, INC., SAFE HARBOR, INC., SAFE HARBOR COMPANIES LLC, SHM BRUCE & JOHNSON, LLC, WILDWOOD PROPERTY MANAGEMENT, LLC, WESTFORD REAL ESTATE MANAGEMENT, LLC, and PAUL DELUCA;
4. The use of the pseudonym in place of the plaintiff's name shall be used on all documents filed with the Court until further order; and
5. The plaintiff's name shall be disclosed to counsel for the defendant.

NEW HAVEN
Dated at ~~Waterbury~~ this 1st day of SEPTEMBER 2020.

BY THE COURT

 (Young)

Judicial District of New Haven
SUPERIOR COURT
FILED

JUL 14 2020

CHIEF CLERK'S OFFICE

October 13, 2020
RETURN DATE: ~~July 28, 2020~~ : SUPERIOR COURT
JANE DOE : J. D. OF NEW HAVEN
V. : AT NEW HAVEN
BRUCE & JOHNSON'S BRANFORD
MARINA, LLC, ET AL : JULY 23, 2020

MOTION FOR PERMISSION TO CONTINUE SEALING OF AFFIDAVIT

Pursuant to Connecticut Practice Book §11-20A(h)(1), (2), and (3), Jane Doe, the plaintiff in the above-entitled action requested permission to lodge her affidavit under seal. The plaintiff hereby moves for the continued sealing of her affidavit for the duration of this anticipated litigation, and represents:

1. That such order is necessary to preserve an interest, which overrides that of the public's interest in knowing the plaintiff's name.
2. The special and sensitive circumstances of this case justify the continued sealing of her affidavit, as continued nondisclosure of the plaintiff's identities will protect the plaintiff from harassment, injury, ridicule, and personal embarrassment.
3. The allegations as contained in the Complaint involve an alleged voyeurism committed by one of the defendants.
4. The continued sealing of her affidavit is necessary and no lesser alternative will suffice.

THE PLAINTIFF,

By: 308035

Garrett M. Moore, Sr., Esq.
Moore, O'Brien & Foti
891 Straits Turnpike
Middlebury, CT 06762
Phone: (203) 272-5881
Juris No.: 408519
Her Attorneys

Moore, O'Brien & Foti - Attorneys at Law
891 Straits Turnpike, Middlebury, CT 06762
203 272-5881 - JURIS NO. 408519

October 13, 2020

RETURN DATE: July 28, 2020	:	SUPERIOR COURT
JANE DOE	:	J. D. OF NEW HAVEN
V.	:	AT NEW HAVEN
BRUCE & JOHNSON'S BRANFORD MARINA, LLC, ET AL	:	JULY 23, 2020

ORDER FOR THE CONTINUED SEALING OF PLAINTIFF'S AFFIDAVIT

The court finds that the plaintiff's interest in protecting her identity compelling and significant in light of the allegations of voyeurism and that such interest outweighs the public's interest in knowing the name of the plaintiff. The continued sealing of plaintiff's affidavit is necessary and no lesser alternative will suffice. It is hereby ORDERED:

1. The plaintiff's affidavit shall remain sealed with the Court until further order.

Dated at New Haven this _____ day of _____ 2020.

BY THE COURT

_____. J.

JUL 14 2020

CHIEF CLERK'S OFFICE

October 13, 2020

RETURN DATE: July 28, 2020	:	SUPERIOR COURT
JANE DOE	:	J. D. OF NEW HAVEN
V.	:	AT NEW HAVEN
BRUCE & JOHNSON'S BRANFORD MARINA, LLC, ET AL	:	JULY 23, 2020

MOTION FOR PERMISSION TO CONTINUE TO USE PSEUDONYM

Pursuant to Connecticut Practice Book §11-20A(h)(1), (2), and (3), Jane Doe, the plaintiff in the above-entitled action requested permission to proceed with the above-entitled matter under a fictitious name. The plaintiff hereby moves for the continued use of such pseudonym for the duration of this anticipated litigation, and represents:

1. That such order is necessary to preserve an interest, which overrides that of the public's interest in knowing the plaintiff's name.
2. The special and sensitive circumstances of this case justify the use of a pseudonym, as continued nondisclosure of the plaintiff's identities will protect the plaintiff from harassment, injury, ridicule, and personal embarrassment.
3. The allegations as contained in the Complaint involve an alleged voyeurism committed by one of the defendants.
4. The pseudonym is necessary and no lesser alternative will suffice.

THE PLAINTIFF,

By: 308035

Garrett M. Moore, Sr., Esq.

Moore, O'Brien & Foti

891 Straits Turnpike

Middlebury, CT 06762

Phone: (203) 272-5881

Juris No.: 408519

Her Attorneys

Moore, O'Brien & Foti - Attorneys at Law
891 Straits Turnpike, Middlebury, CT 06762
203 272-5881 - JURIS NO. 408519

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MARINA, LLC, ET AL : JULY 23, 2020

ORDER FOR THE USE OF A PSEUDONYM

The court finds that the plaintiff's interest in protecting her identity compelling and significant in light of the allegations of voyeurism and that such interest outweighs the public's interest in knowing the name of the plaintiff. The pseudonym is necessary and no lesser alternative will suffice. It is hereby ORDERED:

1. The use of the pseudonym in place of the plaintiff's name shall be used on all documents filed with the Court until further order; and
2. The plaintiff's name shall be disclosed to counsels for the defendants.

Dated at New Haven this _____ day of _____ 2020.

BY THE COURT

J.

October 13, 2020

RETURN DATE: ~~July 28, 2020~~ : SUPERIOR COURT
JANE DOE : J. D. OF NEW HAVEN
V. : AT NEW HAVEN
BRUCE & JOHNSON'S BRANFORD
MARINA, LLC, ET AL :

ORDER

The above motion having been presented to the court, it is hereby ORDERED that a hearing be held thereon on _____, 2020 at _____ AM/PM at the SUPERIOR COURT FOR THE JUDICIAL DISTRICT OF NEW HAVEN AT NEW HAVEN at 235 Church Street, New Haven, Connecticut and that the plaintiff gives notice to the defendants in accordance with Section 11-20A(h)(1), (2), and (3) of the Connecticut Practice Book of the pendency of the motion and of the time when it will be heard by causing a true and attested copy of the motion, the proposed unsigned Writ, Summons, Complaint, Affidavit and of this Order, to be served upon the defendant by some proper officer or indifferent person on or before _____, 2020 and that due return of service be made to this Court.

Dated at New Haven, Connecticut this _____ day _____, 2020.

CLERK OF THE COURT

**TIME, DATE, SCOPE AND DURATION
OF SEALING OR CLOSURE ORDER**

JD-CL-76 Rev. 12-07
P.B. §§ 11-20, 11-20A, 25-59, 25-59A

**STATE OF CONNECTICUT
SUPERIOR COURT**

NOTICE

**No information entitled to
remain confidential should be
placed on this form.**

FOR COURT USE ONLY

- ☒ SEALOR (Document(s) or file sealed)
☐ LIMITOR (Disclosure limited)
☐ CLOSEOR (Courtroom closed)
☒ PSEUDOR (Use of pseudonym(s) granted)

Pursuant to Practice Book Sections 11-20, 11-20A, 25-59 and 25-59A the time, date, scope and, except for court closure orders, duration of the order shall be reduced to writing, signed by the judicial authority, and entered by the clerk in the court file. This form should be used for that purpose.

In addition to signing this form, the judicial authority must also comply with the other requirements of the above rules, which include articulating the overriding interest being protected, specifying its findings underlying the order, and either ordering that a transcript of its decision be included in the court file or preparing a memorandum setting forth the reasons for its order. When sealing an entire court file, the judicial authority must also comply with Sections 11-20A(f) and 25-59A(f).

Instructions to Clerk for Civil and Family Cases: Complete this form upon issuance of the court order and IMMEDIATELY enter it in the court file. Use Section I for an order sealing document(s) or a file. Use Section II for an order limiting disclosure. Use Section III for an order closing a courtroom. Use Section IV for an order granting permission to use pseudonyms. The judicial authority and clerk must sign Section V. Code this form using the appropriate docket legend(s) for the section(s) of the form completed.

Additional Instructions to Clerk for Civil Cases only: If Sections I, II or III are completed, IMMEDIATELY post a copy of this form on a bulletin board adjacent to the clerk's office and accessible to the public and fax the form IMMEDIATELY to Court Operations at (860) 263-2773 for posting on the judicial branch website.

JUDICIAL DISTRICT OF New Haven	AT (Town) New Haven	DOCKET NO. NNH CV20-5048391S
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CASE NAME (In the case of parties for whom a Motion for Permission to Use Pseudonym(s) was granted, use the pseudonym(s).)

DOE, JANE V. BRUCE & JOHNSON'S BRANFORD MARINA, LLC

SECTION I - ORDER SEALING DOCUMENT(S) OR FILE (Use "SEALOR" Docket Legend)

DATE OF SEALING ORDER 9/1/2020	TIME OF SEALING ORDER 12:00 pm	DURATION OF SEALING ORDER Until further order of the court
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SCOPE OF SEALING ORDER ("X" one)

- ☐ Case caption and docket number to be disclosed, contents of file sealed.
☒ The following designated motion(s), pleading(s) or other document(s) is/are sealed.

ENTRY NUMBER(S) OF DOCUMENT(S) SEALED PURSUANT TO THE ORDER

Affidavit in support of Motion (for the use of a pseudonym)

ADDITIONAL ORDERS REGARDING SCOPE

SECTION II - ORDER LIMITING DISCLOSURE (Use "LIMITOR" Docket Legend)

(Use only for order limiting disclosure OTHER THAN SEALING. If order is to seal document(s) or file use Section I above.)

DATE OF ORDER LIMITING DISCLOSURE	TIME OF ORDER LIMITING DISCLOSURE
DURATION OF ORDER LIMITING DISCLOSURE	ENTRY NUMBER(S) OF APPLICABLE DOCUMENT(S)

SCOPE OF ORDER LIMITING DISCLOSURE (Explain limitation on disclosure, e.g., redaction, but do not include confidential information)

SECTION III - ORDER CLOSING COURTROOM (Use "CLOSEOR" Docket Legend)

DATE OF ORDER CLOSING COURTROOM	TIME OF ORDER CLOSING COURTROOM	ENTRY NUMBER OF DOCUMENT
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SCOPE OF ORDER CLOSING COURTROOM

SECTION IV - ORDER PERMITTING USE OF PSEUDONYM(S) (Use "PSEUDOR" Docket Legend)

DATE OF ORDER PERMITTING USE OF PSEUDONYM(S) 9/1/2020	TIME OF ORDER PERMITTING USE OF PSEUDONYM(S) 12:00 p.m.
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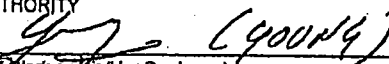
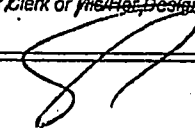
DURATION OF ORDER PERMITTING USE OF PSEUDONYM(S)

Until further order of the court

SCOPE OF ORDER PERMITTING USE OF PSEUDONYM(S)

complete use of pseudonym until further order of the court

SECTION V - SIGNATURES (Complete in every case)

SIGNATURE OF JUDICIAL AUTHORITY 	DATE SIGNED 09-02-2020
SIGNATURE OF CLERK (Chief Clerk or Notary Public) 	DATE SIGNED 9/2/2020

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*** TX REPORT ***

TRANSMISSION OK

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CONNECTION TEL		918602632773
SUBADDRESS		
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